

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: VARIOUS GRAND JURY SUBPOENAS : 12 Misc. 381 (WHP)

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**DECLARATION OF JARED LENOW IN SUPPORT OF GOVERNMENT'S
OPPOSITION TO MOTION TO VACATE CONTEMPT**

JARED LENOW, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the office of Joon H. Kim, Acting United States Attorney for the Southern District of New York.

2. Legal counsel for Credit Suisse informed me of the following, in substance and in part:

a. A Credit Suisse account holder may obtain their account records by physically traveling to, or designating an authorized representative to physically travel to, a Credit Suisse location in Switzerland and requesting the records, a copy of which will then be provided in person to the account holder or authorized representative for whatever purposes they deem appropriate.

b. A written directive to Credit Suisse that complies with Swiss laws is required only if an account holder or an authorized representative of an account holder requests that Credit Suisse itself transmit account documents across Swiss borders.

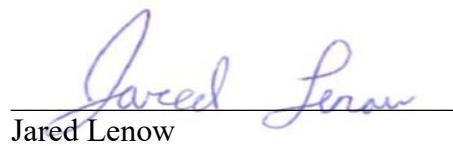
c. Credit Suisse's prior production of select account documents to

Subject E was the result of an internal bank processing error, and any additional account documents that exist will only be provided by Credit Suisse to Subject E or an authorized representative of Subject E pursuant to options (a) or (b) above.

3. From reviewing a report of an interview conducted by law enforcement officers of a financial professional (the “Financial Professional”) who had direct dealings with Subject E and was involved in managing foreign accounts for Subject E, I learned, in substance and in part, that, according to the Financial Professional, the source of the funds in a Credit Suisse account held by the Subject E Foundation (established in 2006), was a Credit Suisse account held directly in Subject E’s name.

4. Subject E has failed to produce to the Government any documents from 2005 or 2006 relating to a Credit Suisse account held in Subject E’s name, or any account balance statements and related documents from 2006 for a Credit Suisse account held by the Subject E Foundation.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 19, 2017, at New York, New York.



Jared Lenow